

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: DAVID A WAUGH	)	Case No. 21 B 13876
	)	
	)	Chapter 13
Debtor(s)	)	
	)	Judge: DONALD R CASSLING

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for June 16, 2022 10:00 am, for the following:

Debtor has not demonstrated that he has the ability to make the increased payments provided for under his amended plan in accordance with 11 U.S.C. Section 1325(a)(1).

**WHEREFORE**, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: May 27, 2022

/s/ Thomas H. Hooper

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Thomas H. Hooper  
Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900

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**CERTIFICATE OF SERVICE**

I, Emily Baez, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

DAVID FREYDIN  
*Attorney for Debtor*

(via CM/ECF)

Patrick Layng  
United States Trustee

(via CM/ECF)

DAVID A WAUGH  
23000 WESTWIND DR  
RICHTON PARK, IL 60471  
*Debtor(s)*

(via U.S. Postal Service)

Dated: May 27, 2022

/s/ Emily Baez

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Emily Baez  
Office of the Chapter 13 Trustee  
55 E. Monroe St., Suite 3850  
Chicago, IL 60603  
(312) 294-5900